UNITED STATES DISTRICT COURT EASTERN DISTRICT OF VIRGINIA RICHMOND DIVISION

ASHLEY COX, et al.,)
PLAINTIFFS,))
v.) Case No: 3:21cv253-HEH
ELLEN MARIE HESS,)
in her official capacity as Commissioner)
of the Virginia Employment Commission,)
DEFENDANT.)))

JOINT MOTION FOR ENLARGEMENT OF TIME TO FILE STATUS REPORT

All parties, by counsel, move the Court for an enlargement of one week to file their Status Report previously ordered for filing today. (Docket No. 47). As previously represented to the Court, both sides have continued to work together to determine appropriate next steps and narrow remaining issues of dispute or disagreement. Their most recent conference was just this week, again attended by each team of attorneys as well as leadership of the Virginia Employment Commission. The Parties ask the Court for an additional week to provide their substantive status report on Friday, October 22, 2021. A proposed Order accompanies this Motion.

WHEREFORE, Plaintiffs and Defendant jointly and respectfully move for an order enlarging the time to file a status report until October 22, 2021.

October 15, 2021

Respectfully submitted,

ELLEN MARIE HESS, in her official capacity as Commissioner of the Virginia Employment Commission

By: /s/

William W. Tunner (VSB #38358)

William D. Prince IV (VSB #77209)

Michael G. Matheson (VSB #82391)

John P. O'Herron (VSB #79357)

Rachel W. Adams (VSB #92605)

THOMPSON MCMULLAN, P.C.

100 Shockoe Slip, 3rd Floor

Richmond, Virginia 23219

Tel: (804) 649-7545

Fax: (804) 780-1813

wtunner@t-mlaw.com

wprince@t-mlaw.com

mmatheson@t-mlaw.com

joherron@t-mlaw.com

radams@t-mlaw.com

Counsel for Defendant Ellen Marie Hess, in her official capacity as Commissioner of the Virginia Employment Commission

ASHLEY COX, EMILY DIMOND, PENNY WILLIAMS, AMBER DIMMERLING, AND LENITA GIBSON, on behalf of themselves and all others similarly situated

By:______/s/

Craig C. Marchiando, VSB # 89736

Leonard A. Bennett, VSB # 37523

Drew D. Sarrett, VSB # 81658

CONSUMER LITIGATION ASSOCIATES, P.C.

763 J. Clyde Morris Blvd., Suite 1-A

Newport News, VA 23601 Telephone:

(757) 930-3660

Facsimile: (757) 930-3662 Email:

lenbennett@clalegal.comEmail:

craig@clalegal.com Email:

drew@clalegal.com

Steven Fischbach, VSB # 94280

VIRGINIA POVERTY LAW CENTER

919 East Main Street, Suite 610

Richmond, VA 23219 Telephone: (804) 351-5266 Email: steve@vplc.org

Brenda Castaneda, VSB # 72809
Patrick Levy-Lavelle, VSB # 71190
Granville Warner, VSB # 24957 **LEGAL AID JUSTICE CENTER**1000 Preston Avenue
Charlottesville, Virginia 22903
Telephone: (434) 977-0553 Email:
brenda@justice4all.org Email:
pat@justice4all.org Email:
cwarner@justice4all.org

Daniel Turczan, VSB # 81551 **LEGAL AID WORKS** 500 Lafayette Blvd., Suite 100 Fredericksburg, Virginia 22401 Telephone: (540) 371-1105 Email: dturczan@legalaidworks.org

Kristi Cahoon Kelly, VSB #72791
Andrew J. Guzzo, VSB #82170
Casey S. Nash, VSB #84261
KELLY GUZZO, PLC
3925 Chain Bridge, Suite 202
Fairfax, VA 22030
Telephone: (703) 424-7572
Facsimile: (703) 591-0167 Email: kkelly@kellyguzzo.com Email: aguzzo@kellyguzzo.comEmail: casey@kellyguzzo.com

Counsel for Plaintiffs Ashley Cox, et al.